

**UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND**

LUIS C. DELAHOZ,
Plaintiff

vs.

C.A. No.: 1:15-CV-484

THE HOME GUARDIAN
TRUST; SN SERVICING
CORPORATION; and,
LENDER LIVE NETWORK, INC.,
Defendants

**PLAINTIFF, LUIS C. DELAHOZ'S, MOTION TO EXTEND TIME TO RESPOND TO
DISCOVERY PROPOUNDED BY DEFENDANT, HOME GUARDIAN TRUST**

Now comes the Plaintiff, Luis C. Delahoz, and hereby respectfully requests an extension of time to respond to discovery propounded by Defendant, Home Guardian Trust. Plaintiff's responses are now due on March 14, 2016.

As grounds for this Motion, Plaintiff states that due to an extended illness and a bout with the flu his counsel has not been in his office and/or available to assist in responding to the discovery requests. Further, Plaintiff's counsel was recently out of his law office due to the unexpected death of his daughter's mother. Plaintiff's counsel has contacted the Defendant to request an extension of time. At the time of this filing, Plaintiff has not received a response from the Defendant.

WHEREFORE, Plaintiff, Luis C. Delahoz, requests that the Court allow Plaintiff to serve its responses to Defendant's interrogatories and document production requests within thirty (30) days of allowing this motion.

Respectfully submitted,
Plaintiff, Luis C. Delahoz,
By and through his attorney,

/s/ Todd S. Dion

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CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of March 2016, that I have caused the within Motion to be filed with the Court via the ECF filing system. As such, this document will be electronically sent to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants.

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